Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems and Their Impact on the Existing Television Broadcast Service	)	MM Docket No. 87-268
	)	
Review of Technical and Operational Requirements: Part 73-E, Television Broadcast Stations	)	
	)	
Reevaluation of the UHF Television Channel and Distance Separation Requirements of Part 73 of the Commission's Rules	)	

COMMENTS OF GROUP W

Westinghouse Broadcasting Company, Inc. ("Group W") hereby files its Comments in response to the above-referenced Tentative Decision and Further Notice of Inquiry ("Tentative Decision") regarding Advanced Television Systems ("ATV"). Group W is the licensee of five major market television stations[1/] and is a producer of entertainment and information programming for broadcasting and cable television.[2/]

The Commission's determination to proceed expeditiously in the spectrum planning process necessary to provide high quality ATV terrestrial service is a significant decision which Group W applauds. As an active participant in this process,[3/] Group W

1/ KYW, Philadelphia, Pennsylvania; KPIX, San Francisco, California; WBZ, Boston, Massachusetts; KDKA, Pittsburgh, Pennsylvania; and WJZ, Baltimore, Maryland.

2/ Group W Productions and Group W Satellite Communications.

3/ Group W's Chairman, Burton B. Staniar, serves on the Advisory Committee on Advanced Television Services and Group W has joined in Joint Comments filed today by MST, NAB and other concerned broadcasters.

believes it must be given the highest priority. The United States has long had the foremost over-the-air television system in the world. This system of free television has served the public well and continues to be relied upon as the most important source of news, information, and entertainment by the vast majority of Americans. In particular, over-the-air television provides, almost exclusively, the only source of quality local programming in their individual communities. As mandated by the Communications Act, the continued health of our local broadcasting system is of key importance. Providing a means for over-the-air stations to broadcast the highest quality ATV signal as quickly as possible is crucial to this goal.

The tentative findings of the Commission[4/] are valuable steps forward in realizing expeditious introduction of terrestrial broadcast ATV service. There is no question that ATV is a valuable service which will benefit the public. Existing broadcasters are uniquely positioned to bring the benefits of this technology to the public most quickly. The programming, technical, and business expertise of the broadcasting industry will provide a solid basis for developing and growing ATV services. The Commission's proposal to continue existing service to viewers using NTSC receivers during the development of ATV is a meritorious one. Depending on how the technology develops, this could be accomplished either by transmitting ATV signals to be received directly by both ATV and

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4/ See Tentative Decision at paragraph 4.

NTSC receivers or by simulcasting NTSC and ATV signals on separate channels. Building on the base of existing broadcast station service will ensure that the existing universe of NTSC receivers does not become prematurely obsolete and will allow for the smoothest and most expeditious transition to this exciting new technology.

The Commission's sensitivity not to retard the independent introduction of ATV and other services on non-broadcast media is well placed. However, there is a substantial public benefit to compatibility between equipment associated with the various video delivery methods. This issue needs to be watched closely by the Commission as the technology develops so that appropriate action may be taken, if necessary, to protect the public.

Group W strongly urges the Commission ultimately to adopt a single standard for terrestrial transmission of ATV. Such a standard would encourage manufacturers of transmission equipment and television receivers to proceed quickly in producing their new products. Similarly, it would encourage television stations to begin producing and transmitting programs in ATV. Adoption of a single standard is a pre-requisite to the ability of free over-the-air television to compete effectively with other video media which soon will be introducing ATV. The Commission has set forth a variety of transmission options currently being considered by the industry. Each of these options has certain attractions. While an expedient choice of a universal standard is important, it is simply too early to evaluate them against each other. The prudent decision now is to keep all options

open and see how the systems and equipment develop and perform in tests. Developers of ATV systems, including several in the United States, have shown considerable progress in recent months. Credit should also go to the Commission for creating its Advisory Committee and setting that Committee on a course of deliberate speed. That speed must continue.

One standard which the Commission should consider adopting at this time to further the implementation of ATV relates to the manufacture of television receivers. At a minimum, the Commission should require that all receiver manufacturers equip their new products with a switched baseband input.[5/] With this requirement, receivers could easily accommodate the ATV transmission system signal format ultimately adopted for broadcasters along with the various distribution technologies that may be employed in the future, as well as current NTSC programming. Such an external port would allow direct access of audio and video into the display device in an inexpensive fashion. This would ensure that all distribution methods and system proponents have a "level playing field" and that no single system becomes a defacto standard simply due to the fact that a population of receivers exists in the consumers' hands. Otherwise, it is conceivable that a set manufacturer could begin to sell receivers in the United States without that universal

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5/ Open architecture front ends would allow for even more flexibility in the development of ATV systems. However, this capability could be complex and potentially expensive. Still, the possibility of its use should be carefully explored as ATV technology develops.

quality.

Group W agrees that ATV development, if at all possible, should be confined to spectrum already allocated to the broadcast service. Furthermore, while development within 6 MHz is clearly preferable, additional bandwidth should be considered if necessary to provide service comparable in quality to that available from other media. However, the Commission should not foreclose the possible necessity and practicality of using frequency bands not already allocated for terrestrial television broadcasting in the future. It is simply too early to know the actual spectrum needs of operational ATV systems, because most NTSC compatible ATV systems are confined to computer simulation and theory.

Due to the scarcity of spectrum available for ATV purposes within the current broadcasting allocation, Group W agrees that it would be unwise to allow spectrum in this allocation to be used for non-ATV purposes during an interim period prior to its use for ATV broadcasting. There is no indication that such flexible use would further the development of ATV. At this time, it appears most likely that additional spectrum will be necessary for terrestrial ATV. If non-ATV use were allowed during a transition period, it could be difficult to reclaim the spectrum for ATV service.

Although much progress has been made in the development of ATV technology, it must be recognized that this technology is

still in its infancy. Therefore, the Commission should be careful to adopt a broad enough regulatory scheme to encompass all stages of future technological development. Even as we look to the future, the Commission and the industry should demand a terrestrial broadcast ATV system today which is good enough to compete with other ATV delivery systems. A competitive ATV system must include such features as 35 mm film quality and wide screen display. Despite the difficulties of engineering over-the-air systems, we must not settle for second class ATV status. The benefits of this new technology must be made available to all of the public by developing a system which is useable by the nation's local television broadcast stations.

In conclusion, the Commission is to be commended for its expenditure of a tremendous amount of time and effort, at the highest levels and by its staff, in order to provide better quality broadcast television transmission to the American people. While highly complex technical and regulatory issues are involved, the Commission must continue to guard against proceeding at so leisurely a pace that terrestrial television would be left at the gate by other technologies. The Commission's substantial progress to date provides encouragement that the best decisions for the American public will be made in a timely fashion.

Respectfully Submitted,

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